

EXHIBIT B

1 Q. Okay. What did you spend on rebuilding the network;
2 can you explain that?

3 A. Yes, we hired somebody who worked about 70 hours a
4 week for four months to rebuild every single server.

5 Q. 70 hours a week for four weeks?

6 A. Four months.

7 Q. Four months. I'm sorry. So how much did that cost?

8 A. 9,000 a month times four.

9 Q. Okay. So, it was \$36,000, and I believe I've asked
10 for these documents in discovery, and the response was there
11 were no documents.

12 A. Okay. I want to be careful, but I think I have
13 produced all of this stuff for you guys.

14 Q. Which would have been the cost to rebuild the
15 network?

16 A. I given -- I have absolutely give that up.

17 Q. Okay.

18 A. I've given up every dime of Lorenzo's salary. You
19 guys have that.

20 Q. Well, did you give it to us or did you give it to
21 your lawyer?

22 A. Oh, no, I give everything to John and then John works
23 with the attorneys.

24 Q. Okay. Was the network -- why did the network need
25 rebuilding after Mr. Lorenzo --

1 A. No.

2 Q. Okay. Were your servers experiencing problems that
3 they needed to be rebuilt?

4 A. Servers are always getting updated and rebuilt. It's
5 an ongoing and never-ending thing.

6 Q. Were they due for an upgrade anyway?

7 A. Not in the fashion that we had to do it. Wipe them
8 out. Wipe them clean and start from scratch. Typically, you
9 can just Yum update. Not having to rebuild the entire machine.

10 Q. Yum update, just updates the server that doesn't --

11 A. -- yeah. That's a normal update. But we didn't do
12 that. We stripped it all. We format -- I believe we formatted
13 machines and started from scratch.

14 Q. And you want Mr. Lorenzo to pay for that?

15 A. Yeah.

16 Q. Under what basis?

17 A. Because we felt we needed to rebuild all the
18 machines, because we were concerned that he had left a backdoor
19 as he had done at a previous employer.

20 Q. Did you ever ask him if he left a backdoor to your
21 machines? You can answer. That's a good question.

22 A. I never asked him, and I wouldn't have expected an
23 honest answer.

24 Q. Did you look for backdoors?

25 A. Yes.